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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS SUPPLEMENTAL
BRIEF REGARDING MOTION IN
LIMINE NO. 4**

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal information in its October 23, 2017 Supplemental Brief Regarding Motion *in Limine* No. 4 (“Supplemental Brief”) and exhibits thereto. Specifically, Waymo requests an order granting leave to file under seal the portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Supplemental Brief Regarding Motion <i>in Limine</i> No. 4	Portions highlighted	Defendants
Exhibit A to Waymo’s Supplemental Brief	Entire exhibit	Defendants
Exhibit B to Waymo’s Supplemental Brief	Entire exhibit	Defendants
Exhibit C to Waymo’s Supplemental Brief	Entire exhibit	Defendants
Exhibit D to Waymo’s Supplemental Brief	Entire exhibit	Defendants

I. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. WAYMO’S SUPPLEMENTAL BRIEF AND ACCOMPANYING EXHIBITS

Waymo seeks to seal the portions of Waymo’s Supplemental Brief and accompanying Exhibits A-D because Defendants have designated the information confidential and/or highly confidential. Waymo expects Defendants to file one or more declarations in accordance with the Local Rules. Declaration of Andrea Pallios Roberts, ¶ 3.

III. CONCLUSION

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. For the foregoing reasons, Waymo respectfully requests that the Court grant Waymo’s Administrative Motion.

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DATED: October 23, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By /s/ Jordan Jaffe

Jordan Jaffe

Attorneys for WAYMO LLC